

R E M A R K S

Upon entry of this Response, no changes will have been made to the previously pending claims. Thus, claims 1-19 and 21-24 will remain pending in the application. Examination of the amended claims is respectfully requested in view of the following Remarks.

Previous Office Action (Mailed January 29, 2007)

In an Office Action mailed January 29, 2007, the Examiner required restriction to one of two inventions (Invention I directed to claims 1-19 and 21-24 or Invention II claims 20 and 25-26).

In response to that requirement, Applicant elected Invention I (directed to claims 1-19 and 21-24) without traverse in a Response filed February 13, 2007.

Further, the January 29, 2007 Office Action indicated that an election of Invention I would further be subject to an election between the following Species (with claims 1, 21, and 24 being generic): IA, IB, IC, ID, IE, IF, or IG..

Applicant's Response of February 13, 2007 elected Species IA drawn to a method for the analysis of commercial mortgage backed security portfolios wherein the portfolio is associated with a plurality of credit rating categories (claims 2-19 and 22-23) with claims 1, 21, and 24 being generic with respect to the other species set forth in the January 29, 2007 Office Action.

The claims were amended in view of these elections and the requirements of the Office Action.

Current Office Action (Mailed May 20, 2007)

As best understood by Applicant, the May 30, 2007 Office Action now requires election between a different set of seven newly defined Species, each being associated with a different sentence in the specification.

Applicant respectfully submits that none of the Amendments made in the previous Response necessitated a new classification of Species for this application. Thus, Applicant hereby traverses the new, additional election of species requirement, at least because respecting the originally required (and made) election would not place a serious burden on the Examiner. MPEP 811 and 37 CFR §1.146. That is, even if the Examiner had set forth a *prima facie* case for a new set of Species, a requirement for election would still not be proper in this case. In particular, the embodiments can be searched using the same field of search and the claims all can be readily examined together without unduly burdening the Examiner.

To the extent necessary, however, Applicant hereby elects with traverse the newly defined species B and submits that all of the previously pending claims read on this embodiment.

CONCLUSION

Accordingly, Applicants respectfully request allowance of the pending claims. If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-0191.

Respectfully submitted,

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Date

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